

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Case No. 19-cv-745 (MJD/ECW)

Vexada Clark and Charmaine White,

Plaintiffs,

v.

Karl Krueger and Dane Limited, LLC,

Consent Decree

Defendants.

A. Introduction

1. The Plaintiffs initiated this action to enforce the provisions of the Fair Housing Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. § 3601, *et seq.*, and Minnesota Human Rights Act, Minn. Stat. § 363A. The Plaintiffs allege that Defendants Karl Krueger and Dane Limited, LLC, owners of the rental property located at 3438 Lyndale Avenue North, Minneapolis, MN 55412 and 1415 Morgan Avenue North, Minneapolis, MN 55411 (the “subject properties”) have unlawfully discriminated on the basis of sex and race.

2. Plaintiffs allege that Defendants engaged in housing practices that discriminated on the basis of sex and race as alleged in the First Amended Complaint.

3. Plaintiffs allege that, through this conduct, Defendants have:

- a. Violated 42 U.S.C. § 3604(a) by discriminating against Ms. Clark and Ms. White, respectively, by making housing unavailable on the basis of sex and race;
- b. Violated 42 U.S.C. § 3604(b) by discriminating against Ms. Clark and Ms. White, respectively, in the terms, conditions, or privileges of rental of a dwelling, or in the provision of services or facilities in connection therewith because of their sex and race;
- c. Violated 42 U.S.C. § 3604(c) by making statements indicating a preference, limitation or discrimination based on sex and race;
- d. Violated 42 U.S.C. § 3617 by discriminating against Ms. Clark and Ms. White, respectively, by their conduct constituting coercion, intimidation, treats, or interference with Ms. Clark and Ms. White in the exercise or enjoyment of, or on account of their having exercised or enjoyed their rights under the Fair Housing Act; and
- e. Violated Minn. Stat. § 363A.09, by discriminating against Ms. Clark and Ms. White based on their sex and race.

4. Defendants deny the allegations in this matter and deny that they violated the Fair Housing Act and the Minnesota Human Rights Act.

5. The parties have agreed that this lawsuit should be resolved without a trial to avoid protracted and costly litigation.

6. The parties have agreed to the entry of this Consent Order, as indicated by the signatures below.

Accordingly, it is HEREBY ORDERED as follows:

7. Defendants shall have the phrase “Equal Housing Opportunity” conspicuously located within the text of any and all advertisements or postings regarding properties for sale or rent by Defendants.

8. Defendants shall refrain from discriminating on the basis of race, national origin, color, disability, sex, religion, and familial status as protected under federal law. Defendants, their agents, employees, successors, and all persons in active concert or participation with them shall comply with all provisions of the Fair Housing Act, as outlined in 42 U.S.C. § 3601, *et seq.*

9. This Consent Decree is effective immediately upon its entry by the Court.

10. The Court shall retain jurisdiction over this Decree to enforce the terms of the Decree.

11. The parties to this Consent Decree shall endeavor in good faith to resolve informally any differences regarding interpretation of and compliance of this Consent Decree prior to bringing such matters to the Court for resolution. However, in the event Plaintiffs contend that there has been a failure by any Defendant, whether willful or otherwise, to perform in a timely manner any act required by this Consent Decree or otherwise to act in conformance with any provision thereof, the Plaintiffs may move this Court to impose any remedy authorized by law or equity, including, but not limited to, an

order requiring performance of such act or deeming such act to have been performed, and an award of any damages, costs, and reasonable attorneys' fees which may have been occasion by the violation or failure to perform.


SO ORDERED THIS 20th DAY OF FEBRUARY 2020.

s/ Michael J. Davis

MICHAEL J. DAVIS


UNITED STATES DISTRICT COURT

ON BEHALF OF ALL PLAINTIFFS:


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Dated: 02/17/2020

ON BEHALF OF ALL DEFENDANTS:


CHRISTOPHER WILLS #0394859
Rajkowski Hansmeir Ltd.
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Phone: (320) 251-1055
Email: cwills@rajhan.com

Dated: 2/13/2020

KARL KRUEGER, ON BEHALF OF DANE LIMITED, LLC

By 
Karl Krueger

Dated: 2/12/20